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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JULIA HUBBARD, et al.,

Plaintiff,

- against -

TRAMMELL S. CROW, JR., et al.,
Defendants.

Case No. 2:22-cv-7957-FLA-MAA

**DECLARATION IN
SUPPORT OF PLAINTIFFS'
APPLICATION FOR
EXTENSION OF TIME TO
SERVE PROCESS**

I, Sophie L. Saydah, a non-attorney legal analyst at the law firm Balestriere Fariello, declare under penalty of perjury that the foregoing is true and correct:

1. I am a legal analyst at the law firm Balestriere Fariello (the “Firm”).

2. This declaration is submitted in support of the application that the Court grant Plaintiffs Julia Hubbard (“Hubbard”) and Kayla Goedinghaus (“Goedinghaus”) an extension of time under Civil Local Rule 6-1 and Federal Rules of Civil Procedure 6(b), to serve the Summons and Complaint in this action on Defendants Dr. Mrugeshkumar Shah (“Shah”), Michael Cain (“Cain”), Philip Ecob (“Ecob”), H.J. Cole (“Cole”), Kurt Knewitz (“Knewitz”), Paul Pendergrass (“Pendergrass”), Ralph Rogers (“Rogers”), Richard Butler (“Butler”), Mark Molina (“Molina”), Shawn Mayer (“Shawn Mayer”), Jade Mayer (“Jade Mayer”), Integrity Based Marketing, LLC, Storm Fitness Nutrition, LLC, Ultra Combat Nutrition, LLC, EcoLoft Homes LLC, and Elevated Wellness Partners LLC (collectively the “Unserved Defendants”).

3. On December 23, 2023, I called and secured the services Civil Process Direct, LLC, specializing in service of civil process, to serve documents upon the Unserved Defendants.

4. On January 19, 2023, I also called and secured the services of ABC Legal, another firm specializing in the service of civil process, to serve documents upon the Unserved Defendants.

5. Between November 11, 2022, and February 1, 2023, on behalf of Hubbard and Goedinghaus, I have made several attempts through email or the process servers, to deliver the Summons and Complaint in the action to Defendants’ emails or to their last known address.

6. On December 31, 2022, a process server attempted to serve Michael Cain

("Cain") through a processor at his known address at 3883 Turtle Creek Blvd., Dallas, Texas 75219. The process server informed me that no apartment unit was listed for Cain and the leasing office was closed. I was later informed on January 12, 2023, that an address search was run for Cain and a most recent address was found for Cain.

7. On January 28, 2023, I was informed by a processor that an attempt was made to serve Philip Ecob ("Ecob"), but the processor was unable to access the address as it was a secure building. Although the processor waited and contacted the apartment office, the processor could not gain access that day. On January 30, 2023, I was told that the processor made a second attempt at service and although they were able to confirm that Ecob was a resident at the building, the processor was not granted access to serve the Defendant.

8. On November 11, 2022, I sent an email on behalf of the Hubbard and Goedinghaus to Kurt Knewitz ("Knewitz"). Although the email was delivered, Knewitz did not accept service. On December 27, 2022, a process server attempted to serve Knewitz at his last known address at 6009 W. Parker Rd., #149-189, Plano, TX, 75093 but I was informed that it was not a residential address but a 'Pack n Mail Shoppe'.

9. On November 11, 2022, I sent out an email to Paul Pendergrass's ("Pendergrass") known counsel, John Cossum and did not hear back. The process server also attempted to serve Pendergrass at his last known address at 6952 Navigation Drive Grand Prairie, Texas 75054. The process server was informed that Pendergrass had moved, and the new owner would inform the Defendant. I was told by the process server that the Defendant later called and informed them that he was out of town and service

could be attempted again when he returned.

10. On November 11, 2022, I sent out an email to Ralph Rogers (“Rogers”), but have not heard back on whether the Summons and Complaint have been received.

11. The process server informed me that an address search was run on Richard Butler (“Butler”), but his last known address was deficient. A most recent address was just recently found for him.

12. I emailed Mark Molina (“Molina”), on November 11, 2022, but received no acknowledgement. When I called the process server, they informed me that when they attempted to serve at Molina’s last known address, the process server was told that Molina has relocated. Another attempt was made at Molina’s most recent address, but the processor was unable to access the new address.

13. On November 11, 2022, I sent an email was sent to Shawn Mayer (“Shawn Mayer”) and Jade Mayer (“Jade Mayer”), but there was no acknowledgement. On January 2, 2023, I was told by the processor that they attempted personal service at Shawn and Jade Mayer’s last known residence but there was no answer. The processor noted that there was a car parked in the driveway.

14. Between December 26, 2022, and December 30, 2022, service was attempted on Integrity Based Marketing, LLC, Storm Fitness Nutrition, LLC, Ultra Combat Nutrition, LLC, EcoLoft Homes LLC, and Elevated Wellness Partners LLC. However, process servers were informed either that the Unserved Defendants were no longer listed at their given addresses or that no such company occupied the building.

15. I am still actively making attempts to serve these defendants and keeping

up with the retained process servers.

Dated: New York, New York

February 6, 2022



Sophie L. Saydah